

Message Text

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SUBJECT: CCMS: APRIL 27-28, 1976 PLENARY SESSION:

UK ROUND TABLE REPORT

REF: STATE 81206

FCO PROVIDED EMBASSY WITH COPY UK ROUND TABLE REPORT
APR 14. TEXT FOLLOWS:

1. IN THE HIGHLY MECHANIZED. HIGHLY URBANIZED SOCIETY
IN WHICH WE LIVE, EVEN THE MOST ARDENT ANTI-POLLUTION
LOBBY WOULD CONCEDE THAT THE ABSOLUTE ELIMINATION OF
EMISSIONS. EFFLUENTS AND CONTAMINATION, IF NOT IMPOSS-
IBLE. WOULD BE AT A COST SO GREAT THAT NO COUNTRY COULD
CONTEMPLATE SUCH AN UNDERTAKING. IN THE VIEW OF THE UK.
THE ENVIRONMENT CAN BE REGARDED AS A RESOURCE - IT HAS A
CAPACITY FOR THE ABSORPTION. DISPERSION AND DEGRADATION
OF POLLUTANTS. THIS CAPABILITY IS IMPORTANT. AND ITS
USE SHOULD BE OPTIMIZED AND NOT OVERSTRETCHED. IN DE-
CIDING HOW TO DEAL WITH POLLUTION HAZARDS, CONSIDERA-
TIONS OF RISK - AND OF WHAT LEVELS OF RISK ARE OR ARE
NOT ACCEPTABLE - ARE OF THE ESSENCE.

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2. IT IS CLEAR THAT MAN IS CONFRONTED BY AN INCREASINGLY DIVERSE RANGE OF FOREIGN CHEMICAL COMPOUNDS DISCHARGED INTO THE ENVIRONMENT BY HIM. SOME OF WHICH MAY CONSTITUTE HAZARDS TO HIS HEALTH IN THE SHORT OR LONG TERM. THEY ALSO OFFER POTENTIAL INSULT TO FLORA AND FAUNA. AND MAY UPSET THE DELICATELY BALANCED CYCLES OF OUR PHYSICAL ENVIRONMENT; HERE THE DAMAGE CAN RANGE FROM AN INSULT TO AESTHETIC VALUES OR THE LOSS OF AN AMENITY TO THE OUTRIGHT DESTRUCTION OF SPECIES.

3. HOW IS RISK DETERMINED? INCREASING SOPHISTICATION OF MONITORING AND DETECTION TECHNIQUES HAS LED TO THE IDENTIFICATION OF LOW LEVELS OF POLLUTANT IN UNEXPECTED SECTORS OF THE ENVIRONMENT. THE QUESTIONS WHICH FOLLOW MAY BE OBVIOUS, BUT THE ANSWERS REMAIN UNCERTAIN. DO SUCH LEVELS CONSTITUTE HAZARDS? WHAT IS THE DEGREE OF RISK? SHOULD COSTLY MEASURES BE TAKEN AGAINST EVERY SINGLE ONE ON THE BASIS OF A SUSPECTED POTENTIAL FOR HARM? IF NOT HOW DO WE DETERMINE WHEN AND WHERE TO INTERVENE?

4. THERE ARE TWO ASPECTS TO THE PROBLEM - FIRSTLY HOW DOES ONE MAKE AN ASSESSMENT OF THE POTENTIAL HAZARD? SECONDLY. WHERE SHOULD THE LINE BE DRAWN IN POLLUTION CONTROL - WHAT IS AN ACCEPTABLE LEVEL OF RISK? A SIMPLISTIC ANSWER TO THE LATTER EXISTS IN TERMS OF ECONOMIC THEORY: "POLLUTION SHOULD BE ABATED TO THE POINT WHERE THE EXTRA BENEFIT TO SOCIETY FROM FURTHER ABATEMENT JUST EQUALS THE EXTRA COST TO SOCIETY OF THIS ABATEMENT." (ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION, 5TH REPORT. 1976). THE DIFFICULT QUESTION RAISED BY THIS IS. OF COURSE. THE QUANTIFICATION OF THE COST/BENEFIT/RISK EQUATION

5. WHAT VALUE CAN BE PLACED ON LIFE? FINANCIAL VALUES HAVE BEEN PUT ON HUMAN LIFE IN FIELDS OTHER THAN POLLUTION. PURVEYORS OF LIFE INSURANCE HAVE DEVELOPED THIS TO A FINE ART. IN MEDICAL SCIENCE, WHERE LIMITED RESOURCES FOR SAVING LIFE MAY HAVE TO BE ALLOCATED, THE VALUE OF ONE LIFE AGAINST ANOTHER MUST BE ASSESSED - UNCLASSIFIED

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THE SELECTION OF PATIENTS FOR KIDNEY DIALYSIS. AND CERTAIN TYPES OF HEART SURGERY ARE EXAMPLES. HERE DETAILED KNOWLEDGE OF EACH INDIVIDUAL CAN BE BROUGHT TO BEAR.

6. IN THE CASE OF TRAFFIC ENGINEERING. A DIFFERENT SET OF VALUES HAS TO BE USED. THE COST OF TRAFFIC ACCIDENTS CAN BE ASSESSED IN TERMS OF THE COST OF INJURY, DAMAGE TO THE VEHICLES INVOLVED, LOSS OF EARNINGS. LOSS OF CON-

SUMPTION, INSURANCE AND THE COST OF THE PUBLIC SERVICES EMPLOYED. IN CONJUNCTION WITH ACCIDENT STATISTICS, THE ESTIMATED 'COST' OF AN ACCIDENT CAN BE USED TO ASSESS THE EXPENDITURE WHICH IS JUSTIFIED TO IMPROVE. SAY. A DANGEROUS ROAD JUNCTION.

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7. WHEN CONSIDERING THE IMPACT OF POLLUTION, THE TARGET GROUP IS OFTEN UNKNOWN AND THE HUMAN 'COST' UNQUANTIFIABLE. IT WOULD, OF COURSE, BE POSSIBLE TO ESTIMATE THE IMPAIRMENT OF ENVIRONMENTAL QUALITY IN TERMS OF THE COST OF THE WORK REQUIRED TO RESTORE IT TO ITS FORMER STATE. HOWEVER, WHEN A PLANT OR ANIMAL SPECIES IS DAMAGED OR DRIVEN TO EXTINCTION. OR A HUMAN LIFE IS IMPAIRED, PERHAPS MANY YEARS AFTER EXPOSURE, HOW CAN ONE QUANTIFY SUCH A LOSS?

8. WHAT RISK IS ACCEPTABLE TO THE PUBLIC AND GOVERNMENT? IN REAL LIFE, HOWEVER, GOVERNMENTS DO HAVE TO TAKE DECISIONS, OFTEN WITHOUT DETAILED SCIENTIFIC EVIDENCE,

ON THE CONTROL OF ENVIRONMENTAL POLLUTANTS. THESE MUST BE INFLUENCED BY THE DEGREE OF RISK WHICH IS ACCEPTABLE TO THE PUBLIC. AMERICAN STUDIES INDICATE THAT THE ACCEPTANCE OF VOLUNTARY RISK IS 1,000 TIMES GREATER THAN THE ACCEPTANCE OF INVOLUNTARY RISK. THIS FINDING IS REFLECTED TO SOME EXTENT IN ESTIMATED FIGURES WHICH SUGGEST THAT THERE WERE MANY TIMES MORE DEATHS ON THE ROAD

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THAN ATTRIBUTABLE TO POLLUTION; BY CONTRAST, RESEARCH EFFORT INTO ROAD SAFETY WAS ONLY TWICE THAT ON POLLUTION.

9. IN SUCH WAYS PUBLIC OPINION CONTRIBUTES ITS OWN EVALUATION OF ACCEPTABLE RISK - OUR SECOND QUESTION (PARA 4). IN ANSWER TO OUR FIRST - THE ASSESSMENT OF POTENTIAL HAZARD - IS DEPENDENT ON PAINSTAKING SCIENTIFIC EVALUATION. DATA ON HUMAN HEALTH OR ON THE BIOSPHERE AND ITS

INTERRELATIONSHIPS, AND DATA ON POLLUTANT LEVELS HAS TO BE GENERATED, COLLECTED, COLLATED AND APPRAISED. IF AND WHEN A DOSE-RESPONSE RELATIONSHIP HAS BEEN EVALUATED FOR THE EFFECTS OF A GIVEN POLLUTANT IN ANIMAL STUDIES, AN ACCEPTABLE OR TOLERABLE LEVEL IN THE ENVIRONMENT MAY POSSIBLY BE SUGGESTED.

10. DOSE-RESPONSE RELATIONSHIPS IN MOST CASES CANNOT BE CLEARLY DEFINED BECAUSE OF A LACK OF DATA OR OF KNOWLEDGE OF MECHANISM, AND THERE IS ALWAYS SOME RESIDUAL AREA OF RISK. IT IS VERY DIFFICULT TO EXTRAPOLATE RESULTS FROM A LABORATORY STUDY IN ANIMAL SPECIES TO MAN IN THE ENVIRONMENT. THE PROBLEM WHICH CAUSES THE GREATEST DIFFICULTY IS GAUGING WHERE IN THE AREA OF RESIDUAL RISK THE THRESHOLD OF ACCEPTABILITY SHOULD BE PLACED. AS HAS ALREADY BEEN POINTED OUT, PUBLIC TOLERANCE OF A HAZARD IS VARIABLE.

11. A CASE IN POINT IS PERHAPS A SUBSTANCE WHICH HAS BEEN SHOWN TO BE CARCINOGENIC IN ANIMALS, BUT FOR WHICH THERE IS NO EVIDENCE OF TUMOR CAUSATION IN MAN OVER MANY YEARS OF USE. THIS SURELY POSES A REAL ENOUGH DILEMMA. ONE COUNTRY MAY CHOOSE A COURSE WHICH PROHIBITS THE USE OF SUCH A SUBSTANCE REGARDLESS OF OTHER FACTORS; OTHER NATIONAL AUTHORITIES MAY HAVE DIFFERENT RESPONSES. POLICY WILL INEVITABLY VARY FROM COUNTRY TO COUNTRY DEPENDING ON THEIR SCIENTIFIC ADVICE, PUBLIC OPINION, HISTORICAL AND ECONOMIC FACTORS, TRADITION AND MANY OTHER ELEMENTS.

12. SHOULD WE USE THE "BEST PRACTICABLE MEANS"? IN FACT DECISIONS HAVE TO BE TAKEN WITHOUT SUFFICIENT IN-

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FORMATION EITHER ON A PUTATIVE CARCINOGEN OR A MINOR NUISANCE. POLLUTION HAS TO BE CONTROLLED BY WHATEVER MECHANISMS SEEM APPROPRIATE. IN SOME CASES PROBLEMS CAN BE SOLVED QUITE SIMPLY BY RESITING A POLLUTING SOURCE AWAY FROM HUMAN HABITATION AND ENVIRONMENTS WHICH MAY BE DAMAGED BY ITS ACTIVITIES. AS SUCH POLLUTION CONTROL HAS INCREASINGLY TO BE CONSIDERED AS AN ASPECT OF LAND USE PLANNING. IT IS CLEARLY NOT ALWAYS POSSIBLE TO SITE EMITTERS SUCH THAT THEY DO NOT IMPINGE UPON THE COMMUNITY. AND IS LIKELY TO BECOME EVEN LESS SO IN THE FUTURE. IN THE UK, OVER A PERIOD OF YEARS, A CONCEPT OF 'BEST PRACTICABLE MEANS' HAS DEVELOPED TO DEAL WITH POLLUTION, PARTICULARLY WITH REGARD TO ATMOSPHERIC POLLUTION

13. 'PRACTICABLE' IN THIS CONTEXT MEANS 'REASONABLY PRACTICABLE HAVING REGARD TO LOCAL CONDITIONS, CURRENT TECHNICAL KNOWLEDGE AND FINANCIAL IMPLICATIONS.' THE 'MEANS' CAN INCLUDE MODIFICATION OF DESIGN, INSTALLATION, MAINTENANCE AND OPERATION OF A PLANT AS WELL AS EFFLUENT CONTROL. DISCHARGES ARE CONTROLLED NOT ONLY BY LIMITING THEIR OUTPUT, BUT BY RENDERING THEM AS INOFFENSIVE OR AS HARMLESS AS PRACTICABLE. THIS CONCEPT IS MOST CLEARLY DEVELOPED AND APPLIED IN THE FIELD OF AIR POLLU-

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TION CONTROL IN THE UK. IT WOULD BE POSSIBLE TO GENERATE A THEORETICAL SET OF EMISSION STANDARDS FOR ATMOSPHERIC POLLUTANTS FROM FIRST PRINCIPLES. IN FACT, IT WOULD SEEM MORE DESIRABLE TO DEVELOP A GUIDELINE WHICH CAN BE APPLIED IN PRACTICE AT A LEVEL DEPENDING ON THE PARTICULAR CIRCUMSTANCES.

14. WHAT IS THE BEST APPROACH IN PRACTICE? THE PRACTICE OF 'BPM' IS APPLIED TO SOME EXTENT IN THE UK AT THE MOMENT. THE CHIEF ALKALI INSPECTOR SETS WHAT IS KNOWN AS A 'PRESUMPTIVE' LIMIT - A LIMIT FOR A PARTICULAR EMISSION FROM ONE PROCESS. THESE LIMITS CAN BE VARIED FROM SITE TO SITE DEPENDING ON CONDITIONS, AND CAN BE IMPROVED WITH TIME AND TECHNOLOGICAL INOVATION. THE CONCEPT HAS BEEN DEVELOPED WITH REGARD TO AIR POLLUTION BY THE ROYAL COMMISSION ON ENVIRONMENTAL POLLUTION (FIFTH REPORT, 1976). THEY HAVE PROPOSED THAT AIR QUALITY GUIDELINES BE DEVELOPED WITH THE OBJECTIVE OF PROVIDING A FRAMEWORK FOR THE APPRAISAL AND IMPROVEMENT OF AIR QUALITY AND TO ASSIST IN THE FORMULATION OF LONG TERM AIMS FOR POLLUTION REDUCTION. THESE AIR QUALITY GUIDELINES WOULD BE DEVELOPED AS A RANGE OF VALUES - THE UPPER LEVEL ABOVE WHICH ACTION WOULD HAVE TO BE UNCLASSIFIED

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TAKEN TO REDUCE CONCENTRATIONS, THE LOWER LEVEL BELOW WHICH ACTION TO REDUCE CONCENTRATIONS WOULD NOT GENERALLY BE JUSTIFIED. AND IN BETWEEN TARGET BANDS FOR INDUSTRIAL AND RURAL AREAS.

15. SIMILAR APPROACHES OBTAIN IN OTHER AREAS OF POLLUTION CONTROL IN THE UK. IN WATER POLLUTION CONTROL, THE AIM IS TO DEFINE A QUALITY OBJECTIVE FOR THE ENVIRONMENT AND TO CONFINE EMISSIONS SO THAT THIS QUALITY OBJECTIVE IS ATTAINED. THE CONTROL OF POLLUTION ACT 1974 EXTENDS EXISTING POWERS TO PROVIDE A MECHANISM FOR THE CONTROL OF EFFLUENTS INTO SURFACE OR GROUND WATERS AND SEWERS. IT PROVIDES THAT WATER AUTHORITIES SHALL BE INFORMED OF ALL SUCH DISCHARGES AND GIVEN DETAILS OF THEIR NATURE, COMPOSITION, DAILY QUANTITY RELEASED AND MAXIMUM RATE OF RELEASE. WITH A REGISTER OF THIS DATA THE WATER AUTHORITY CAN ASSESS THE BURDEN OF POLLUTION WHICH

MAY OCCUR WITHIN THE CONTEXT OF THE USE TO WHICH THE AFFECTED WATER COURSE IS PUT. WIDE POWERS EXIST UNDER THE WATER ACT 1973 FOR THE INSTITUTION OF ANY NECESSARY CONTROLS, AND THE PLANNING OF THE FUTURE USE AND DEVELOPMENT OF WATER SUPPLIES IN THE UK.

16. HOW CAN WE DEAL WITH SPECIFIC CHEMICAL POLLUTANTS? CHEMICALS RELEASED DIRECTLY OR INDIRECTLY INTO THE ENVIRONMENT MAY ALSO BE CONTROLLED BY OTHER MEANS. DETERGENT POLLUTION FROM DOMESTIC USE IS CONTROLLED IN THE UK NOT BY LIMITING CONSUMPTION, BUT BY AGREEMENT WITH THE MANUFACTURER THAT MATERIAL RETAILED IS OF AN APPROPRIATE STANDARD (A "PRODUCT" STANDARD) AND IS OF A NATURE WHICH WILL NOT PERSIST IN THE ENVIRONMENT OR AFFECT SEWAGE TREATMENT FACILITIES ADVERSELY. HERE A BALANCE IS REACHED WHEREBY THE CONSUMER HAS A CONVENIENT PRODUCT. THE ECOSYSTEM IS PROTECTED AND THE MANUFACTURER IS NOT UNDER CONSTRAINT OF LAW AND CAN IMPROVE HIS PRODUCT WHEN TECHNICALLY FEASIBLE.

17. PESTICIDES ARE DIFFUSED VERY WIDELY IN THE ENVIRONMENT. IN THE UK THEY ARE SUBJECT TO A VOLUNTARY NOTIFICATION SYSTEM KNOWN AS THE PESTICIDES SAFETY PRECAUTIONS SCHEME. UNDER WHICH PESTICIDES ARE REGISTERED.
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THEIR USES, DISTRIBUTION AND LABELING ARE CONSIDERED BY AN ADVISORY COMMITTEE. THIS SCHEME, AT THE MOMENT, COVERS AGRICULTURAL PESTICIDES BUT IS BEING EXTENDED TO COVER NON-AGRICULTURAL USES SUCH AS WOOD PRESERVATIVES, ETC. OTHER COUNTRIES WILL CERTAINLY HAVE DIFFERENT MECHANISMS OF PESTICIDE CONTROL, BUT THE GOAL WILL BE THE SAME - TO MINIMIZE ENVIRONMENTAL CONTAMINATION AND DAMAGE CONSISTENT WITH THE EXPECTED BENEFITS.

18. DETECTION OF WIDESPREAD CONTAMINATION OF THE ENVIRONMENT BY POLYCHLORINATED BIPHENYLS (PCBS) HAS BEEN A PARTICULAR SOURCE OF CONCERN. THEY ILLUSTRATE AN EXTREME CASE OF THE TYPE OF POLLUTION WHICH CAN OCCUR. PCBS HAVE BEEN SHOWN EXPERIMENTALLY TO CAUSE VARIOUS BIOLOGICAL EFFECTS IN ANIMAL POPULATIONS, AND HAVE BEEN IMPLICATED IN OUTBREAKS OF HUMAN DISEASE. THEY ARE NOW USED LARGELY IN SEALED HEAT-TRANSFER AND ELECTRICAL SYSTEMS (ONLY THE LATTER IN THE UK), BUT HAVE BEEN USED IN PAPER MANUFACTURE AND OTHER DISPERSIVE ACTIVITIES. IN THE UK AGREEMENT WAS REACHED WITH THE MANUFACTURER OF

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PCBS TO LIMIT THEIR USE TO CLOSED SYSTEM APPLICATIONS AND INDUSTRIAL EFFLUENTS CONTAINING PCBS ARE CONTROLLED. A DISPOSAL SYSTEM HAS BEEN INSTITUTED. ALTERNATIVES TO PCBS USE, IN SOME CASES, SUCH AS MINERALS OILS, HAVE ATTENDANT PROBLEMS. THIS IS ONE RISK-BENEFIT SITUATION WHERE A COMPROMISE HAS BEEN FOUND IN THE UK BETWEEN OUT-RIGHT PROHIBITION OF PRODUCTION AND UNBRIDLED RELEASE INTO THE ENVIRONMENT. (PCBS ARE PERHAPS A SUBJECT TO WHICH OTHER COUNTRIES COULD DESCRIBE THEIR APPROACH AND MIGHT PROVIDE A SUBJECT FOR DISCUSSION. LEAD IS ANOTHER SUCH TOPIC).

19. WHAT ABOUT PHYSICAL POLLUTANTS? OTHER ELEMENTS OF POLLUTION POSE DIFFERENT PROBLEMS. NOISE IS A PARTICULARLY EMOTIVE QUESTION. LEGISLATION EXISTS IN THE UK TO CONTROL MOTOR VEHICLE NOISE BY INSISTING ON ADEQUATE SILENCER MECHANISMS (ANOTHER FORM OF PRODUCT STANDARD). AIR TRAFFIC NOISE IS ALLEVIATED BY CONTROL OF ROUTES. HEIGHTS, RATES OF CLIMB, AVOIDANCE OF BUILT UP AREAS WHERE POSSIBLE, AND TO SOME EXTENT BY AERO-ENGINE DESIGN AND SPECIFICATION. IN THIS CASE PUBLIC TOLERANCE IS, PERHAPS, HIGHER BECAUSE OF THE AMENITY PROVIDED BY THE POLLUTER. UNDER THE CONTROL OF POLLUTION ACT 1974,

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PLANS HAVE BEEN MADE FOR A MOVE TOWARDS THE DECLARATION OF "NOISE ABATEMENT ZONES" BY LOCAL AUTHORITIES, IN THE SAME WAY AS SMOKE CONTROL ZONES EXIST NOW. WITHIN THESE NEW ZONES, NOISE MONITORING WOULD TAKE PLACE ON A REGULAR BASIS, AND STEPS WOULD BE MADE TOWARDS GRADUAL REDUCTION OF NOISE NUISANCES.

20. IS MONITORING AN INTEGRATED PART OF POLLUTANT CONTROL? AS INDICATED EARLIER, THE DETECTION AND MONITORING OF POLLUTION NUISANCES IS AN IMPORTANT FACTOR IN THEIR CONTROL. HAVING ASSESSED POTENTIAL HAZARD USING EXPERIMENTAL DATA, THE LEVEL PRESENT IN VARIOUS ENVIRONMENTAL COMPARTMENTS HAS TO BE MEASURED AND THE EFFECTIVENESS OF THE CONTROLS IMPOSED EVALUATED. THIS FEEDBACK IS OF GREAT IMPORTANCE. CONTROLS CAN BE ADJUSTED DEPENDING ON THE FINDINGS (AS IS DONE BY THE UK ALKALAI AND CLEAN AIR INSPECTORATE AND IN THE PESTICIDES SAFETY PRECAUTIONS SCHEME) TO ACHIEVE A GIVEN QUALITY IN THE COMPARTMENT EXPOSED TO POLLUTANT. THE SETTING OF EMISSION STANDARDS REQUIRES CAREFUL MONITORING FOR ENFORCEMENT PURPOSES, USE OF TOO STRINGENT A STANDARD CAN LEAD TO WASTE OF VALUABLE RESOURCES. THE ACHIEVEMENT OF A QUALITY OBJECTIVE IS DEPENDENT ON A COMPREHENSIVE MONITORING SYSTEM AND FLEXIBLE CONTROL OF EMISSIONS TO MAINTAIN AND IMPROVE THE STATUS OF A PART OF THE ENVIRONMENT. DIFFERENT COUNTRIES TAKE DIFFERING ATTITUDES TO THESE APPROACHES.

21. THUS THE UK POLICY ON POLLUTION CONTROL IS LINKED WITH A PARTICULAR PHILOSOPHY WHICH HAS DEVELOPED OVER A PERIOD OF TIME. THE AIM IS TO EVALUATE THE RISK ATTACHED TO A GIVEN POLLUTANT AND FROM THIS TO ASSESS ACCEPTABLE LEVELS OF EMISSION FOR THE PREVAILING CIRCUMSTANCES. THE INITIAL EVALUATION OF EXPERIMENTAL DATA IN ANIMALS REQUIRES EXTRAPOLIATION TO MAN WITH ITS ATTENDANT DIFFICULTIES. HAVING CROSSED THAT GULF, THE TARGET POPULATION HAS TO BE DEFINED AND ALLOWANCE MADE FOR ANY WEAKER MEMBERS OF SOCIETY WHO MAY BE ESPECIALLY AT RISK. ONCE THE EVALUATION OF THE RISK HAS BEEN PREPARED, THE ACCEPTABLE LEVEL OF RISK IS CONSIDERED. THIS ACCEPTABILITY IS DEPENDENT NOT JUST ON THE VALUES WHICH UNCLASSIFIED

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MAY BE ARBITRARILY PLACED ON LIFE OR THE QUALITY OF LIFE IN FINANCIAL TERMS, BUT ON JUDGEMENTS INFLUENCED BY THE PUBLIC TOLERANCE OF THAT RISK.

22. THE AREA OF ACCEPTABLE RISK IDENTIFIED THEN HAS TO
BE MAINTAINED BY A FLEXIBLE SYSTEM OF ADMINISTRATION
WITH CONTINUAL MONITORING OF THE POTENTIAL RISK. THE
EXPERIENCE GAINED FROM THE APPRAISEAL OF KNOWN POLLUTANTS
PROVIDES A CORNERSTONE FOR OUR JUDGEMENT OF THE POLLU-
TANTS WHICH WE MAY HAVE YET TO FACE.

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